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Daniel B. Olmos (SBN: 235319) NOLAN BARTON & OLMOS, LLP 430 D. Street Davis, CA 95616 (650) 326-2980 (t) (650) 326-9704 (f) 4 dolmos@nbo.law Attorney for Defendant 5 Balbino Sablad 6 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF CALIFORNIA 9 SACRAMENTO DIVISION 10 11 UNITED STATES OF AMERICA, Case No. 2:21-cr-00138 TLN 12 Plaintiff, STIPULATION AND ORDER TO **CONTINUE STATUS HEARING** 13 v. 14 BALBINO SABLAD, 15 Defendant. 16 17 IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant 18 19 that the status hearing in this matter be continued from March 17, 2022, to April 7, 2022, to permit 20 21

United States Attorney Rosanne Rust, and Defendant Balbino Sablad, through his undersigned counsel, that the status hearing in this matter be continued from March 17, 2022, to April 7, 2022, to permit defense counsel adequate time to review discovery produced by the government and to conduct defense investigation. The Court signed the order substituting undersigned defense counsel into the case on December 29, 2021, *see* Docket No. 21, the parties stipulated to a protective order, and the court entered the protective order on January 6, 2022, Docket No. 23. The Government has produced two tranches of discovery to the defense, including one production earlier this week, and the defense is reviewing the discovery in a diligent manner.

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The parties further agree and request that the Court order, for the purpose of computing time 1 under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which the trial of this case must 2 commence, that the time period between March 17, 2022, to and including the April 7, 2022, status 3 4 hearing, be excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and B(iv) and Local Code T4 to allow 5 defense counsel reasonable time to review the discovery and prepare his client's defense. The parties 6 stipulate and agree that the ends of justice served by granting this time exclusion would outweigh the 7 best interest of the public and the defendant in a speedy trial. 8 For the foregoing reasons, the parties stipulate to continue the status conference to April 7, 2022, 9 at 9:30 a.m. 10 IT IS SO STIPULATED. 11 12 Dated: March 10, 2022 NOLAN BARTON & OLMOS, LLP 13 /s/ Daniel B. Olmos 14 Daniel B. Olmos Attorney for Defendant Balbino Sablad 15 16 17 Dated: March 10, 2022 PHILLIP A. TALBERT United States Attorney 18 By: /s/ Rosanne Rust 19 Rosanne Rust 20 **Assistant United States Attorney** 21 22 23 /// 24 ///25 26 /// 27

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**ORDER** 

GOOD CAUSE HAVING BEEN SHOWN, and pursuant to the stipulation by the parties, it is hereby ordered that the status hearing for defendant Balbino Sablad be continued to April 7, 2022, at 9:30 a.m. It is further ordered that, for the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., the time period between March 17, 2022, to and including April 7, 2022, be excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and B(iv) and Local Code T4, and that the ends of justice served by granting this time exclusion outweigh the best interest of the public and the defendant in a speedy trial.

Dated: March 11, 2022

Troy L. Nunley

United States District Judge